

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

EAST CAPITAL INVESTMENTS
CORP,

Plaintiff,

-against-

GENTECH HOLDINGS, INC.,

Defendant.

Case No. 1:21-cv-10300-LLS

Hon. Louis L. Stanton, U.S.D.J.

Hon. Ona T. Wang, U.S.M.J.

**DECLARATION OF EDWARD ANDREW PALTZIK IN SUPPORT
OF MOTION TO WITHDRAW AS COUNSEL**

1. My name is Edward Andrew Paltzik, and I am counsel of record for the Defendant Gentech Holdings, Inc.

2. I have been admitted to practice law since 2007 when I was admitted to practice in New York. I am currently in good standing and admitted to practice in the following jurisdictions: New York, New Jersey, the Eastern District of New

York, the Southern District of New York, the District of New Jersey, the United States Court of Appeals for 2nd, 3rd, 6th, 9th, and Federal Circuits, and the United States Supreme Court.

3. I am currently a Partner at the law firm of Joshpe Mooney Paltzik LLP (“JMP”), which has an office at 1407 Broadway, Suite 4002, New York, NY 10018.

4. Recently, I have been forced to take an indefinite leave from the practice of law due to multiple urgent medical conditions that require sustained and immediate attention. As a result of these medical conditions, my ability to adequately represent clients is materially impacted and I am unable to provide representation at this time and unable to practice law. This has been a difficult time for me and my family. I am able to provide additional information about the nature of my conditions if necessary to the court *in camera*.

5. I am the only Partner at JMP that has the requisite litigation experience and knowledge to serve as counsel of record in this action, and my conditions render me unable to adequately represent the clients or to practice law.

6. In addition, the other partners at JMP are in the process of joining another law firm, and we plan to discontinue JMP’s operation as a law firm.

7. As a result of my urgent medical conditions and my inability to

practice law, the unavailability of other counsel in my firm with the requisite experience available to handle this matter, and the fact my firm will cease operations as a law firm in the near future, I am respectfully moving to withdraw as counsel.

DATED: August 26, 2022

A handwritten signature in black ink, appearing to read 'E. Paltzik', written in a cursive style.

Edward A. Paltzik